

UNITED STATES DISTRICT COURT
for the
NORTHERN District of NEW YORK

United States of America)

v.)

)

) Case No. 8:16-MJ-403 (GLF)

)

Yvonne Jock)

Defendant

FILED
AUG 09 2016
AT ____ O'CLOCK
Lawrence K. Baerman, Clerk - Plattsburgh

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

August 8, 2016 R.R.

On or about the date of December 11, 2015 in the county of Franklin in the NORTHERN District of NEW YORK, the defendant violated 8 U. S. C. § 1324(a)(1)(A)(ii), an offense described as follows:

Yvonne Jock did knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

On August 8, 2016, at 7:23 am a United States Border Patrol Agent was conducting surveillance of a black Honda Odyssey van in the parking lot of the Bears Den, located on State Route 37 on Akwesasne Mohawk Reservation. While conducting surveillance, the agent noticed a Grey GMC Acadia drive up and park next to the Honda van. At approximately 8:35 am, 2 Chinese subjects exited the GMC Acadia and enter the Honda Odyssey. The GMC Acadia exited the Bears Den parking lot and headed west on 37.

At 8:40 am the GMC Acadia was stopped by U.S. Customs and Border Protection Officers at the Massena Port of Entry during a North Bound inspection. The driver was identified as Yvonne Jock date of birth 7/15/1992 and a passenger identified as Lindsay Cole date of birth 8/20/1985. Both subjects were escorted into the Port of Entry.



Richard N. Raymonda
Complainant's signature

Richard N. Raymonda, Border Patrol Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: August 9, 2016

City and state: Plattsburgh, New York



Gary L. Favro
Judge's signature

Gary L. Favro, U.S. Magistrate Judge, N.D.N.Y.

Continuation Sheet, United States v. Angel Smerlyn PENA-CANELA

In an interview at the POE, Yvonne Jock stated that she was asked by Lindsey Cole to use her vehicle to pick up some "friends". Yvonne agreed to driving her GMC Acadia and pick up Lindsay Cole's friends. Yvonne Jock then stated they went to a location in Snye, Quebec where Cole left the 2 Chinese Nationals. Yvonne then admitted to bringing the two Chinese Nationals across the U.S. International Border with Canada illegally on the River rd.

Yvonne then stated they drove to the Bears Den